

Plaintiffs' request is GRANTED. Plaintiffs should move for a motion for default judgment and permanent injunction by December 11, 2020.

SO ORDERED.

Date: November 24, 2020

New York, New York



JOHN P. CRONAN  
United States District Judge



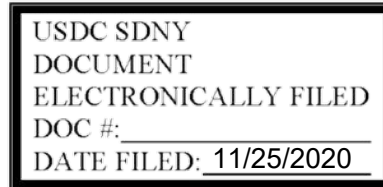
Oppenheim  
+ Zebrak, LLP

Matthew I. Fleischman  
4530 Wisconsin Avenue NW | 5<sup>TH</sup> Floor  
Washington, DC 20015  
T: (202) 480-2965 | F: (866) 766-1678  
fleischman@oandzlaw.com | www.oandzlaw.com

November 24, 2020

**VIA ECF**

The Honorable John P. Cronan  
United States District Court  
500 Pearl Street  
New York, NY 10007



**Re: *Pearson Education, Inc., et al. v. Labos, et al.*, Case No. 1:19-cv-487**

Dear Judge Cronan:

We represent Plaintiffs Pearson Education, Inc., McGraw Hill LLC, formerly McGraw-Hill Global Education Holdings, LLC,<sup>1</sup> Cengage Learning, Inc., and Bedford, Freeman & Worth Publishing Group, LLC ("Plaintiffs") in the above-referenced action. On November 3, 2020, Plaintiffs informed the Court that they anticipated moving for default judgment and a permanent injunction (the "Motion") against those Defendants who are and remain in default on or before November 30, 2020 and requested that the Court waive its requirement for a pre-motion conference. (ECF No. 50). On November 4, 2020, the Court granted Plaintiffs' request. (ECF No. 51)

At this time, Plaintiffs are still in the process of preparing their Motion and do not expect that it will be completed by November 30, 2020. Among other things, the request for damages in the Motion is supported by evidence collected from third-party discovery, some of which involves ongoing analyses. Accordingly, Plaintiffs propose to file their Motion by December 11, 2020. Plaintiffs have not previously sought to extend this date and, as there is no Case Management Plan in this case, no other dates are impacted. As the Defendants are in default, Plaintiffs have not sought to obtain such Defendants' consent.

Should the Court have any concerns about Plaintiffs' proposal or wish to discuss it, Plaintiffs' counsel are available to do so. We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Matthew I. Fleischman

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<sup>1</sup> On January 1, 2020, McGraw Hill LLC became the successor in interest to McGraw-Hill Global Education Holdings, LLC.